

EXHIBIT 253

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

No. 22-cv-10904-JSR

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF INAIS BORQUE was taken
on the 26th day of May, 2023 at the Ritz-Carlton Hotel,
6900 Great Bay, Nazareth, St. Thomas, U.S. Virgin
Islands, between the hours of 9:07 a.m. and 3:33 p.m.
pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

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Registered Merit Reporter
Hill's Reporting Services
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1 A. Yes.

2 Q. Is that monitoring a responsibility the
3 USVI took seriously?

4 MR. ACKERMAN: Object to form.

5 THE WITNESS: Yes.

6 Q. (By Mr. O'Laughlin:) What measures did it
7 take to monitor Jeffrey Epstein once he registered
8 there?

9 A. I mean, at that time, I'm not sure how
10 they handled the registry, honestly.

11 Q. So you're designated as the corporate
12 designee on sex offender monitoring, but you're not
13 aware of how he was monitored in 2010, correct?

14 MR. ACKERMAN: Objection, form.

15 THE WITNESS: Yes. I mean, it
16 changes. So I'm not sure who was in
17 charge at that time. I don't know
18 how -- to what extent they monitored the
19 registry at that time.

20 Q. (By Mr. O'Laughlin:) And did you do any
21 investigation to prepare yourself to testify regarding
22 that early monitoring period?

23 A. No.

24 Q. Okay. If you go to page 11 in this same
25 exhibit, this is a news article from the Daily Beast

1 with the title "Billionaire Pedophile Goes Free." And
2 it has the same fax transmission information as the
3 other document we looked at, that same fax number from
4 Florida, and the July 22nd, 2010 transmission date.
5 Do you see that?

6 A. Yes.

7 Q. And the date of the article is July 20th,
8 2010. Do you see that?

9 A. Yes.

10 Q. So the Florida form that we just looked at
11 showed the established -- Epstein established
12 residence in USVI as of July 19th, 2010. The next
13 day, July 20th, this article came out. And then two
14 days later, Florida faxed this article to the USVI
15 DOJ, correct?

16 A. Yes, from what I'm looking at.

17 Q. And then this article was placed in
18 Epstein's official sex offender monitoring file,
19 correct?

20 A. Not that I'm aware of.

21 Q. You testified earlier that this document is
22 the 2010 documents from Epstein's registration file
23 and this article is in this document.

24 A. Yeah, because of the dates.

25 Q. What did you say?

1 A. I said, yes, because of the dates.

2 Q. So the fact that this is in here means it
3 was in his official file, correct?

4 A. Yes. And I probably bypassed it.

5 Q. Okay. So DOJ was aware of the contents its
6 sex offender monitoring file, correct?

7 A. Repeat that.

8 MR. ACKERMAN: Objection. Form.

9 Q. (By Mr. O'Laughlin:) USVI DOJ was aware of
10 the contents of its own sex offender monitoring file
11 for Jeffrey Epstein, correct?

12 MR. ACKERMAN: Objection. Form.

13 THE WITNESS: To my knowledge,
14 they should.

15 Q. (By Mr. O'Laughlin:) They should be aware?

16 A. Yes.

17 Q. So it was aware of the contents of this
18 article, correct?

19 MR. ACKERMAN: Objection, form.

20 Scope.

21 THE WITNESS: Yes.

22 Q. (By Mr. O'Laughlin:) So if you look at the
23 first bullet in the article, it says, "Palm Beach's
24 police chief objected to Epstein's special treatment
25 and gave the Daily Beast an exclusive look at his

1 A. Just to confirm that that's where they
2 live.

3 Q. How frequent are they?

4 A. It's random times. It's not really --
5 it's frequent, but it's just random times. Not a
6 specific time.

7 Q. Are there any requirements for how often a
8 check needs to be conducted?

9 A. No.

10 Q. Can you estimate how many checks are done
11 per an offender? Like is it once a year, once a
12 month, once a week?

13 MR. ACKERMAN: Objection, form.

14 Scope.

15 THE WITNESS: Usually once a week.

16 But then annually we do hold our annual
17 operation where we take a week in
18 St. Croix and a week in St. Thomas and
19 St. John to hit all offenders in that
20 one week.

21 Q. (By Mr. O'Laughlin:) Okay. So offenders
22 are generally checked once a week, but then once a
23 year, there's a week where you check all offenders,
24 correct?

25 A. Yes.

1 Q. So every offender should be checked at
2 least once a year as part of that week, correct?

3 A. As part of the week, yes.

4 Q. But the average offender would be checked
5 like 50 times in a year because there's 52 weeks in
6 the year?

7 A. Could be possible, yes.

8 Q. Okay. Do you know how frequently Epstein
9 was checked?

10 A. I don't know.

11 Q. Would all of the compliance checks for
12 Epstein be in his compliance check file?

13 A. It should be, yes.

14 Q. So the maximum amount roughly that
15 compliance checks would happen would be, like, 50
16 times in a year, correct?

17 A. Repeat that question.

18 Q. The maximum number of checks in a year
19 would be approximately 50 based on the usual practice?

20 A. Yeah. There's not really a max.

21 Q. But that would be the average because
22 they're checked weekly.

23 A. Correct.

24 Q. And so this file, who decides when checks
25 are made?

1 and monitor the offender.

2 Q. (By Mr. O'Laughlin:) And why specifically?

3 MR. ACKERMAN: Objection.

4 THE WITNESS: Excuse me?

5 Q. (By Mr. O'Laughlin:) Why specifically is
6 it an important part of monitoring?

7 MR. ACKERMAN: Objection. Asked
8 and answered.

9 THE WITNESS: To make sure we know
10 where they are at all times.

11 Q. (By Mr. O'Laughlin:) And is part of the
12 reason for doing compliance checks that if someone --
13 if the investigator is there and sees something
14 suspicious, they can report it?

15 A. Yes.

16 Q. So -- and is the frequency of checks
17 related to the investigator's ability to see
18 suspicious activity?

19 MR. ACKERMAN: Objection to form.

20 THE WITNESS: Repeat that
21 question.

22 Q. (By Mr. O'Laughlin:) Is the frequency at
23 which checks are conducted important to be able to
24 determine whether there is suspicious activity
25 occurring for a registered offender?

1 would be less likely if they're
2 frequently.

3 Q. (By Mr. O'Laughlin:) You're saying if
4 they're checked frequently, it's less likely that that
5 activity would be detected?

6 A. Yes.

7 MR. ACKERMAN: Objection.

8 Q. (By Mr. O'Laughlin:) How so?

9 MR. ACKERMAN: Objection.

10 THE WITNESS: So what -- I mean,
11 they know they're being checked on. So
12 they're going to make sure that they
13 don't have anything around or they don't
14 do anything that's not in compliance.

15 Q. (By Mr. O'Laughlin:) I see what you're
16 saying. So if they're checked frequently, they're
17 less likely to have any criminal conduct generally,
18 because they are being checked on frequently, correct?

19 A. Yes.

20 Q. Got it. And if they're checked only once,
21 then they're more likely to have criminal conduct,
22 correct?

23 A. Right, because they won't know when we're
24 coming.

25 THE REPORTER: I'm sorry, repeat

1 accident.

2 Q. (By Mr. O'Laughlin:) Are you actually
3 aware of a reason, or have any reason to think
4 compliance checks were lost for Epstein, or you're
5 just speculating?

6 A. I'm just guessing. I don't know
7 specifically for him what happened.

8 Q. Okay. To the best of your knowledge as a
9 30(b)(6) designee, there were no checks in 2017
10 because there's nothing in the file, correct?

11 MR. ACKERMAN: Objection. Asked
12 and answered.

13 THE WITNESS: Not that I know of.
14 I don't know.

15 Q. (By Mr. O'Laughlin:) And then in 2018 is
16 the next one.

17 A. Okay.

18 Q. Here the household occupants are
19 identified, correct?

20 MR. ACKERMAN: Ms. Borque, are you
21 okay?

22 THE WITNESS: Yeah, I'm good. My
23 eyes just burns a little bit. I'm fine.

24 MR. ACKERMAN: I'm sorry. Andy,
25 go ahead and ask that question again. I

1 of St. Thomas, right?

2 A. No, he didn't.

3 Q. Where did Mr. Epstein live?

4 A. From my knowledge, Little St. James.

5 Q. Okay. What was required of DOJ to perform
6 a checkup -- excuse me -- or a check-in of Mr. Epstein
7 on Little St. James?

8 A. Well, from what I was informed, the
9 process of -- I mean, of course, he lives across the
10 water. So they will have to go through DPNR to, I
11 guess, utilize their vessel to go over there.

12 Q. Okay. So the sex offender department or
13 group did not have a dedicated vessel -- I'm sorry,
14 strike that. Let me ask the question differently.

15 Is it your understanding -- what -- let
16 me form this question.

17 Do you have an understanding as to
18 whether the sex offender group had a vessel, a
19 dedicated vessel for it to use in order to perform
20 a checkup on Mr. Epstein's island?

21 A. To my understanding, no, not a designated.

22 Q. And when you say no, does that mean that
23 they did not have a designated vessel?

24 A. No, they did not. They would have to go
25 through DPNR --

1 Q. Okay.

2 A. -- to use theirs.

3 Q. Thank you. Now, there was some questions
4 at the very beginning, way back this morning about
5 training, sex offender training. When you joined the
6 Department of Justice, did you receive any training on
7 how to perform your job?

8 A. Well, from who was over me, which was
9 Shani Pinney, of course informed me of all the
10 process and procedures of the sex offender unit. We
11 would have virtual training on how to handle the
12 registry, and that's about it.

13 Q. Okay. Did those trainings include the
14 purpose of compliance checks?

15 A. Not quite.

16 Q. All right. During the course of your
17 employment, have you -- are you aware of the purpose
18 of a compliance check?

19 A. Yes.

20 Q. And what is the purpose of a compliance
21 check?

22 A. To track and monitor the offender, and
23 make sure they are doing what they're supposed to and
24 live where they say they live.

25 Q. Are there limitations on what you or an

1 offender.

2 Q. Do you consider Leon Brison a credible
3 source?

4 A. As in?

5 Q. Let me ask this question: Do you have
6 experience with Leon Brison?

7 A. Somewhat.

8 Q. Okay. What is your experience with Leon
9 Brison?

10 A. When me and the investigator from
11 St. Croix come over to St. Thomas and do random
12 checks as well.

13 Q. Okay. Are you aware of Leon Brison's
14 reputation within the sex offender group?

15 A. Yes.

16 Q. And what is Mr. Brison's reputation within
17 the sex offender group?

18 A. Well, he's known for sending these kind of
19 threatening emails. That's mostly what I know about
20 him.

21 Q. Okay. Did you discuss this email with
22 Ms. Pinney yesterday?

23 A. Yes, I did.

24 Q. Did Ms. Pinney tell you whether she
25 considered this email to be a credible complaint?

1 A. Yes.

2 Q. And what was -- what did she say?

3 A. From what I recall, she said that it was
4 given to an investigator. I can't remember who
5 specifically.

6 Q. Okay.

7 MR. O'LAUGHLIN: Sorry, what was
8 that answer? I couldn't hear.

9 THE WITNESS: The email was
10 forwarded to an investigator, but I --
11 I'm not sure which investigator it was.

12 Q. (By Mr. Ackerman:) Okay. Let's look at
13 Exhibit 16, but it's the one that's marked Tab 13. If
14 you can pull that out.

15 If you could go to 194 of that document,
16 it's all the way to the end.

17 This document is entitled "Affidavit of
18 Diligent Search."

19 Do you see that?

20 A. Yes.

21 Q. Are you familiar with this form of
22 document?

23 A. Yes, I am.

24 Q. Is this a form of document that you have
25 used in the course of your employment at the